## Case4:10-cv-01993-CW Document437 Filed12/27/12 Page1 of 3 ROD O. DIVELBISS (SBN 102345) RDIVELBISS@COLLETTE.COM 2 COLLETTE ERICKSON FARMER & O'NEILL LLP 235 PINE STREET, SUITE 1300 3 SAN FRANCISCO, CA 94104 TELEPHONE: (415) 788-4646 4 FACSIMILE: (415) 788-6929 5 SCOTT E. SILBERFEIN (Pro Hac Vice) 6 JENNIFER NIGRO (*Pro Hac Vice*) **MOSES & SINGER LLP** 7 The Chrysler Building 405 Lexington Avenue 8 New York, New York 10174-1299 Telephone: (212) 554-7800 9 (212) 554-7700 Facsimile: 10 Attorneys for Defendants Northern Leasing Systems, Inc., MBF Leasing, LLC, Northern Funding, LLC, SKS Associates, LLC, Jay 11 Cohen, Sara Krieger, Leonard Mezei and Sam Buono 12 13 UNITED STATES DISTRICT COURT 14 NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION 15 16 17 JUST FILM, INC.; ET AL., CASE NO. CV 10-01993 CW 18 Plaintiffs, JOINT STIPULATION PURSUANT TO 19 V. LOCAL CIVIL RULE 6-2(b) TO EXTEND TIME TO RESPOND TO 20 MERCHANT SERVICES, INC.; ET AL., PLAINTIFFS' MOTION TO COMPEL AND PLAINTIFFS' MOTION TO SANCTION 21 AND ORDER Defendants. 22 23 24 25 26 27 Case No. C 10-1993 CW 28 JOINT STIPULATION PURSUANT TO LOCAL CIVIL RULE 6-2 TO EXTEND TIME TO RESPOND TO

PLAINTIFFS' MOTION TO COMPEL AND PLAINTIFFS' MOTION TO SANCTION

1	WHEREAS, on December 11, 2012, Plaintiffs filed a motion to compel Leasing
2	Defendants (Northern Leasing Systems, Inc., MBF Leasing, LLC, Northern Funding, LLC, SKS
3	Associates, LLC, Jay Cohen, Sara Krieger, Leonard Mezei and Sam Buono) to produce documents
4	from other lawsuits, and a motion to sanction Leasing Defendants for failure to comply with
5	discovery (dkt. #s 428 and 429, respectively) ("Plaintiffs' Motions");
6	WHEREAS, under the Local Rules, Leasing Defendants' response(s) to Plaintiffs Motions
7	would be due the week of the Christmas holiday when the parties and counsel will be unavailable;
8	WHEREAS, Plaintiffs' replies are due to be filed and served on January 2, 2013;
9	WHEREAS, the hearing on Plaintiffs' Motions is set for January 15, 2013;
10	WHEREAS, no prior extensions with respect to Plaintiffs' Motions have been requested;
11	NOW, THEREFORE, IT IS STIPULATED, by and between the undersigned parties
12	through their respective counsel of record, pursuant to Local Civil Rules 6-1(b) and 2(a), that the
13	Court extend Leasing Defendants' time to respond to Plaintiffs' Motions from December 26, 2012
14	to January 3, 2013. Defendants shall have an extension to January 3, 2013 to file and serve their
15	responses to Plaintiffs' Motions; Plaintiff shall have an extension to January 8, 2013 to file their
16	replies; and the hearing on Plaintiffs' Motions shall be <del>January 15, 2012 at 9:00 a.m.</del> before Hon.
17	January 29, 2013, at 4:00 p.m.  Magistrate Judge Elizabeth Laporte.
18	DATED: December 19, 2012
19	Respectfully submitted,
20	MOSES & SINGER LLP
21	
22	By <u>/s/ Jennifer Nigro</u> Jennifer Nigro
23	Attorneys for Defendants Northern Leasing Systems, Inc., MBF Leasing, LLC, Northern
24	Funding, LLC, SKS Associates, LLC, Jay Cohen, Sara Krieger, Leonard Mezei and
25	Sam Buono
26	Scott E. Silberfein (pro hac vice) Jennifer Nigro (pro hac vice)
27	Moses & Singer LLP
28	Case No. C 10-1993 CW

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